

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

June 19, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

As set forth in their June 7, 2024 letter to Hon. Judge Daniels, ECF No. 9885 at 3-4, the Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are continuing to file publicly (with redactions where appropriate) the judicial documents as to which the meet-and-confer process with all parties has been completed, and which are listed on Plaintiffs' "Schedule of Judicial Documents cleared for Public Filing". ECF No. 9885-1.

Plaintiffs are today filing on the public docket the following twenty (20) judicial documents:

<b>Pls. Exhibit No.</b>	<b>Bates / Production No.</b>
Pls. Ex. 11D	MPS894-CLIP Screenshots
Pls. Ex. 11L	MPS910-CLIP Screenshots
Pls. Ex. 11M	MPS911-CLIP Screenshots
Pls. Ex. 11N	MPS999x_4017_5 and other images
Pls. Ex. 12AA (errata version)	MPS738
Pls. Ex. 12BB (errata version)	MPS688
Pls. Ex. 353	MPS727_202
Pls. Ex. 355	MPS727_142
Pls. Ex. 364	MPS43_136
Pls. Ex. 365	MPS43_137
Pls. Ex. 368	MPS43_152, MPS43_144
Pls. Ex. 369	MPS43_309
Pls. Ex. 373	MPS43_345
Pls. Ex. 375	MPS43_381, 380
Pls. Ex. 376	MPS698_151
Pls. Ex. 377	MPS698_145
Pls. Ex. 383	MPS43_216
Pls. Ex. 390	MPS43_229-30

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Pls. Ex. 392	MPS42_218
Pls. Ex. 394	MPS43_220

Plaintiffs have made certain provisional redactions to these exhibits, as agreed between the parties, including: provisional redactions of images to obscure the faces of individuals who were minors at the time;<sup>1</sup> and provisional redactions to telephone numbers and other data.<sup>2</sup>

All Plaintiffs' judicial documents that include Plaintiffs' provisional redactions ("ppr") are subject to Plaintiffs' reservation of rights to challenge later. ECF No. 9885.

Respectfully submitted,

MOTLEY RICE LLC

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*For the Plaintiffs' Executive Committee for Personal Injury and Death Claims on behalf of the Plaintiffs*

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*For the Plaintiffs' Executive Committee for Commercial Claims on behalf of Plaintiffs*

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*Attorneys for Ashton Plaintiffs*

cc: The Honorable George B. Daniels, via ECF  
 All Counsel of Record via ECF

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<sup>1</sup> In the exhibit "Pls. Ex. 11D\_ppr", Plaintiffs have obscured the faces of minors; the exhibit "Pls. Ex. 11N\_ppr" contains excerpted images without redactions; while in the exhibits "Pls. Ex. 11L" and "Pls. Ex. 11M" no redactions were required.

<sup>2</sup> In exhibits "Pls. Ex. 12AA\_ppr" and "Pls. Ex. 12BB\_ppr", Plaintiffs have redacted telephone numbers and other data. Plaintiffs have had to file "Pls. Ex. 12AA\_ppr" (Bayoumi's handwritten address book) in sections on the ECF to comply with maximum file-size limits. Plaintiffs will make available copies of the whole exhibit as a single PDF via the same process ordered by the Court for DVDs; requests to be directed to Plaintiffs' counsel at: [911documentarchive@kreindler.com](mailto:911documentarchive@kreindler.com).